

**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE DISTRICT OF PUERTO RICO**

Jose I. Maldonado Serrano
Carmen Cruz Pagan
Debtors

Case No. 10-11880 (SEK)

Chapter 7

Citimortgage, Inc.
Creditor

Wilfredo Segarra Miranda
Respondent & Chapter 7 Trustee

MOTION WITHDRAWING LEGAL REPRESENTATION

TO THE HONORABLE COURT:

NOW COMES, Carla Ferrari Lugo and respectfully **STATES:**

1. The subscribing attorney has ceased to represent the above identified Creditor.
2. Therefore, the subscribing attorney respectfully requests the cessation of notice as representative for Creditor in this case.
3. That in the event that there are pending matters in this case, the undersigned attorney respectfully request from this Honorable Court that a term of 30 days be granted to Creditor to announce its new legal representation and that all pending matters be held in abeyance and that Creditor's new legal representation be granted a term to file response or plead.

WHEREFORE, it is respectfully requested from this Honorable Court to:

- a) Allow the undersigned attorney to withdraw from representation of Movant in the captioned case.
- b) To strike her name from the Master List.
- c) To grant Movant 30 days to announce its new legal representation.

RESPECTFULLY SUBMITTED. In Aguadilla for San Juan, Puerto Rico, this 30th Day of June 2011.

CERTIFICATE OF SERVICE: I do hereby certify that a copy of the attached Motion for Relief was filed electronically through the CM/ECF system which will send notification to the parties to their registered e-mail address and via regular mail to RAMESH SINGH RECOVERY MANAGEMENT SYSTEMS CORP 25 SE 2nd AVE STE 1120 MIAMI, FL 33131-1605.

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